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Attorneys for Defendants
PLAYSTUDIOS, Inc. and Andrew Pascal

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTIAN A. FELIPE, individually as
administrator of the CHRISTIAN A. FELIPE
CONTRIBUTORY IRA, and on Behalf of
Similarly Situated Persons,

Plaintiff,

vs.

PLAYSTUDIOS, INC., a Delaware corporation;
ANDREW PASCAL, an individual; and DOES
1 through 100, inclusive,

Defendants.

Case No.: 2:22-cv-01159-RFB-NJK

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING SCHEDULE FOR
FILING AN AMENDED COMPLAINT
AND RESPONSES THERETO**

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1 Lead Plaintiff The Phoenix Insurance Company Ltd. and The Phoenix Provident Pension
2 Fund Ltd. (“Phoenix”) and Defendants PLAYSTUDIOS, Inc. and Andrew Pascal (collectively,
3 “Defendants” and, with Lead Plaintiff, the “Parties”) stipulate as follows:

4 WHEREAS, on April 5, 2022, a complaint was filed in the United States District Court
5 for the Northern District of California alleging violations of the securities laws on behalf of a
6 putative class of stockholders (the “Action”);

7 WHEREAS, the Action is subject to the Private Securities Litigation Reform Act of 1995,
8 Pub. L. No. 104-67, 109 Stat. 737 (1995) (the “Reform Act”), which sets forth specialized
9 procedures for the administration of securities class actions, including appointment of a lead
10 plaintiff, and approval of its selection of lead counsel, to act on behalf of a purported class;

11 WHEREAS, under the Reform Act, all discovery is stayed during the pendency of any
12 motion to dismiss (and all case management and associated deadlines in the Action have been
13 stayed, accordingly) (ECF No. 19);

14 WHEREAS, following a contested lead plaintiff process, on July 12, 2022, the Honorable
15 Judge Vince Chhabria of the United States District Court for the Northern District of California
16 appointed Phoenix as Lead Plaintiff and approved its selection of Pomerantz LLP as lead counsel;

17 WHEREAS, the parties thereafter stipulated to transfer this case to the District of Nevada,
18 Southern Division, and upon transfer, to meet and confer and submit to the Court a proposed
19 schedule for Lead Plaintiff to file an amended complaint and for Defendants’ responses thereto
20 and associated briefing (ECF No. 47), which transfer order issued on July 18, 2022 (ECF No. 48);

21 WHEREAS, on July 20, 2022, the Action was transferred to this Court and assigned to the
22 Honorable Judge Richard F. Boulware, II and Magistrate Judge Nancy J. Koppe;

23 WHEREAS, the Parties having conferred on scheduling matters;

24 NOW THEREFORE, IT IS STIPULATED AND AGREED, subject to the Court’s
25 approval, that:

- 26 i. Lead Plaintiff shall file an amended complaint by **October 4, 2022** (60 days from
27 the submission of this stipulation). The amended complaint will supersede the
28 existing complaint in the Action, and Defendants are not required to respond to any

complaint filed prior to the amended complaint;

- ii. The deadline for Defendants to move, answer, or otherwise respond to the amended complaint is **December 5, 2022**;

Denied without prejudice to filing a separate request at an appropriate time. See Local Rule IC 2-2(b).

- ~~iii. In the event that Defendants move to dismiss the amended complaint, Lead Plaintiff shall file any opposition to Defendants' motion(s) no later than February 3, 2023;~~
~~v. In the event that Defendants move to dismiss the amended complaint, Defendants shall file any replies to Lead Plaintiff's opposition(s) to the motion(s) to dismiss no later than March 21, 2023.~~

Dated: August 5, 2022

MUEHLBAUER LAW OFFICE, LTD.

SNELL & WILMER L.L.P.

By: /s/Andrew R. Muehlbauer
 Andrew R. Muehlbauer, Esq.

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*Attorneys for Lead Plaintiff and
 Lead Counsel for the Proposed Class*

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 and Andrew Pascal*

IT IS SO ORDERED.


 United States Magistrate Judge

DATED: August 8, 2022